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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

Julian Ricardo Chacon,

Defendant.

Case No. 2:18-cr-326-APG-NJK

**Stipulation and Order to Continue
Sentencing Hearing**

Defendant Julian Ricardo Chacon and the United States, by and through the undersigned, hereby agree and stipulate, and request an Order from this Court upon such stipulation and agreement, that the sentencing hearing in this matter, currently scheduled for June 10, 2019 at 2:00 pm, should be continued to July 18, 2019 at 10:00am, as follows:

1. Counsel for the defendant and counsel for the United States have been working through some legal and factual issues relating to the sentencing in this matter, including one issue that could have a substantial impact on the positions of the parties at sentencing and thus, the sentence ultimately imposed by the Court. The parties agree that a brief continuance is in both of their best interests.

2. Counsel for the parties reached out to the Court's courtroom deputy to alert her to their request for a continuance. She suggested that the Court's

1 calendar would accommodate a sentencing hearing on July 18, 2019 at 10:00am. In
2 light of work responsibilities and travel conflicts, counsel for both parties are
3 available on that day.

4 3. Mr. Chacon is in custody, but does not object to this continuance.

5 4. This is the parties' first stipulation to continue the sentencing hearing.
6 The stipulation between the parties is entered into not for purposes of delay, but to
7 provide counsel an opportunity to work through legal and factual issues relating to
8 the sentencing hearing.

9 Dated this 28th day of May, 2019

10 NICHOLAS TRUTANICH
11 United States Attorney

12 / s / Daniel J. Cowhig

13 DANIEL J. COWHIG
14 Assistant United States Attorney

/ s / Crane Pomerantz

15 CRANE M. POMERANTZ
16 Nevada Bar No.: 14103
17 410 South Rampart Boulevard
18 Las Vegas, Nevada 89145

19 *Counsel for Defendant Chacon*
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1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 **United States of America,**

4 Plaintiff,

5 v.
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7 **Julian Ricardo Chacon,**

8 Defendant.
9

Case No. 2:18-cr-00326-APG-NJK-1

Order

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11 The Court, having considered the above stipulation of the parties, and good cause
12 appearing, finds as follows:

13 1. Counsel for the defendant and counsel for the United States have been
14 working through some legal and factual issues relating to the sentencing in this
15 matter, including one issue that could have a substantial impact on the positions of
16 the parties at sentencing and thus, the sentence ultimately imposed by the Court.
17 The parties agree that a brief continuance is in both of their best interests.

18 2. Counsel for the parties reached out to the Court's courtroom deputy to
19 alert her to their request for a continuance. She suggested that the Court's
20 calendar would accommodate a sentencing hearing on July 18, 2019 at 10:00am. In
21 light of work responsibilities and travel conflicts, counsel for both parties are
22 available on that day.

23 3. Mr. Chacon is in custody, but does not object to this continuance.

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25 The stipulation between the parties is entered into not for purposes of delay, but to
26 provide counsel an opportunity to work through legal and factual issues relating to
27 the sentencing hearing.
28

1 IT IS HEREBY ORDERED that the sentencing hearing in this matter, currently
2 scheduled for June 10, 2019 at 2:00 p.m., shall be continued until July 18, 2019 at 10:00 a.m.

3 IT IS SO ORDERED this 29th day of May, 2019.

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7 Andrew P. Gordon
8 United States District Court Judge
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